

## **EXHIBIT 2**

**[*PROPOSED*] ORDER GRANTING TRUSTEE'S  
MOTION *IN LIMINE* NUMBER 2 TO CONFIRM ALL  
REQUESTS FOR ADMISSION AS DEEMED ADMITTED**

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Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
the estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

BAM L.P., MICHAEL MANN, MERYL MANN  
Defendants.

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04390 (SMB)

**[PROPOSED] ORDER CONFIRMING ALL  
REQUESTS FOR ADMISSION AS DEEMED ADMITTED**

Upon consideration of the Trustee's Motion *in Limine* Number 2 To Confirm All Requests For Admission As Deemed Admitted (the "Motion") dated November 19, 2018, ECF No. \_\_\_, filed by Irving H. Picard, as trustee ("Trustee") for the liquidation of the business of Bernard L. Madoff Investment Securities LLC ("BLMIS") under the Securities Investor Protection Act, 15 U.S.C. § 7aaa *et seq.*, and the substantively consolidated estate of Bernard L. Madoff ("Madoff"), the Declaration of Dean D. Hunt in Support of the Motion dated November 19, 2018, ECF No. \_\_\_; and it appearing that due and proper notice of the Motion and the relief requested therein having been given, and no other further notice needing to be given; and a hearing having been held on the Motion on \_\_\_\_ (the "Hearing"); and this Court having jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334; and the Court having reviewed the Motion, responsive pleadings, the arguments of counsel at the Hearing and the record in this case; and for the reason set forth in the transcript of the Hearing on the Motion, **IT IS HEREBY:**

**ORDERED** that the Court confirms that the Trustee's Requests for Admission served on Defendants are deemed admitted; and it is further

**ORDERED**, that the Court retains jurisdiction to enforce and implement the terms and provisions of this order

Dated: November \_\_, 2018  
New York, New York

/s/ \_\_\_\_\_

HONORABLE STUART M. BERNSTEIN